

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DEUTSCHE BANK NATIONAL TRUST)
COMPANY AS TRUSTEE FOR GSAMP)
TRUST 2004-AHL)

Plaintiff,

V.

RODOLFO SALINAS; BANK OF)
AMERICA, N.A.; CITY OF CHICAGO, A)
MUNICIPAL CORPORATION,)

Defendants.

Case No: 1:13-CV-0731

Judge: Ruben Castillo

**MOTION FOR JUDGMENT OF FORECLOSURE AND TO APPOINT A SPECIAL
COMMISSIONER**

NOW COMES the Plaintiff, DEUTSCHE BANK NATIONAL TRUST COMPANY AS TRUSTEE FOR GSAMP TRUST 2004-AHL, by Megan Christine Adams, one of its attorneys, and in support of its Motion for Judgment of Foreclosure and to Appoint a Special Commissioner, states as follows:

1. Plaintiff initiated these proceedings on January 30, 2013, seeking a Judgment of Foreclosure and Sale.
2. Pursuant to the Court's February 26, 2013 Order, all Defendants were defaulted for their failure to timely appear and the Court retained jurisdiction to enter the appropriate judgment of foreclosure.
3. Defendant's are not currently on active duty in the United States Military. (*see* Affidavit as to Military Service attached as Exhibit A).
4. Plaintiff's claim of damages is for a sum that is made certain by computation and is more specifically set forth in its supporting Judgment Affidavit. (*see* Affidavit of Amounts Due and Owing attached as Exhibit B; *see* Certificate of Prove-up of Foreclosure Fees and Costs attached as Exhibit C).
5. Further, Pursuant to Section 1506(f) of the Illinois Mortgage Foreclosure Law and 28 U.S.C. §2001(a), Plaintiff hereby moves to appoint a Special Commissioner for the purpose of conducting a public foreclosure sale.

6. Plaintiff moves to appoint JUDICIAL SALES CORP. as Special Commissioner, who shall be authorized to conduct a public sale of the subject property in accordance with the terms of the Judgment of Foreclosure.
7. Special Commissioner JUDICIAL SALES CORP. is a duly authorized commissioner for the District Court, Northern District of Illinois.

WHEREFORE, the Plaintiff respectfully requests that this Court enter the proposed Judgment of Foreclosure and Sale against the Defendants for that amount as set forth and made certain in its Judgment Affidavit and Certificate of Prove-up of Foreclosure Fees and Costs, and enter an Order appointing JUDICIAL SALES CORP. as Special Commissioner for the purposes of conducting a public foreclosure sale of the subject property in accordance with those terms set forth in the Judgment of Foreclosure.

Respectfully submitted,

By: /s/ Megan Christine Adams

Potestivo & Associates, P.C.
Megan Christine Adams (ARDC#6312221)
223 W. Jackson Blvd., Suite 610
Chicago, Illinois 60606
Telephone: (312) 263-0003
Main Fax: (312) 263-0002
Our File No.: C14-95533